



State of New Jersey  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
25 MARKET STREET  
PO BOX 112  
TRENTON, NJ 08625-0112

PHILIP D. MURPHY  
*Governor*

TAHESHA L. WAY  
*Lt. Governor*

MATTHEW J. PLATKIN  
*Attorney General*

MICHAEL C. WALTERS  
*Acting Director*

May 28, 2025

**VIA CM/ECF**

Hon. José R. Almonte, U.S.M.J.  
United States District Court  
Martin Luther King Bldg. & U.S. Courthouse  
50 Walnut Street, Courtroom PO 8  
Newark, NJ 07101

**RE: Dion Miller v. Sean Means, et al.  
Civil Action No. 2:25-cv-1009-CCC-JRA**

Dear Judge Almonte:

I represent the Hudson County Prosecutor's Office ("HCPO") in the above-referenced matter, in which several individual defendants connected to the HCPO have also been joined as defendants – namely, Vincent Doherty, Mike Gelchion, and Charlie Russo (together "Individual Defendants").

Plaintiff's counsel has confirmed that service was recently completed for each of the Individual Defendants. As I previously advised, I expected my office to receive representation requests from the Individual Defendants, and I can now confirm that that process is presently underway. However, before I can formally begin representing them, my office must first engage in a two-step process: (1) determine whether the Individual Defendants can be afforded representation pursuant to Title 59 and *Wright v. State*, 778 A.2d 443 (N.J. 2001); and (2) presuming such is appropriate, then complete conflict checks for each party to ensure that my office can represent the Individual Defendants.

Consequently, I am writing to respectfully request that the HCPO and the Individual Defendants share a common deadline to answer, move, or otherwise respond to the Complaint and that that deadline be extended for sixty (60) days. The extension will allow the Individual Defendants time to submit representation requests, allow my office time to complete its due diligence, and will afford the Individual Defendants time to retain separate counsel in the event my office cannot undertake representation. The extension will also serve the interests of judicial economy by avoiding piecemeal filings by my office for the HCPO and Individual Defendants.



HUGHES JUSTICE COMPLEX · TELEPHONE: 609-376-2440  
New Jersey is an Equal Opportunity Employer · Printed on Recycled Paper and Recyclable



Hon. José R. Almonte, U.S.M.J.  
May 28, 2025  
Page 2

The HCPO's time to answer, move, or otherwise respond to the Complaint is presently June 6, 2025. If the extension requested herein is granted, the response deadline for the HCPO and the Individual Defendants would be August 5, 2025.

Plaintiff's counsel has graciously consented to this request.

Thank you in advance for your time and consideration of this request. Should the Court have any questions or concerns, do not hesitate to contact me.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/Michael B. McNeil  
Michael B. McNeil  
Deputy Attorney General

c. All counsel of record (via CM/ECF)